

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MARYLAND  
at Greenbelt

IN RE:

Nebra Overretta Singleton

DEBTOR(S)

Case No.: 19-16817

Chapter 7

U.S. Bank National Association, as Trustee,  
successor in interest to Bank of America,  
National Association, as Trustee, successor  
by merger to LaSalle Bank National  
Association, as Trustee for Merrill Lynch  
First Franklin Mortgage Loan Trust 2007-1,  
Mortgage Pass-Through Certificates, Series  
2007-1, by Nationstar Mortgage LLC, d/b/a  
Mr. Cooper, Servicing Agent

MOVANT

vs.

Nebra Overretta Singleton

and

Steven H. Greenfeld, Trustee

RESPONDENT(S)

**MOTION SEEKING RELIEF FROM AUTOMATIC STAY AS TO THE  
PROPERTY KNOWN AS  
304 DR ANDREWS WAY, UNIT A, INDIAN HEAD, MD 20640**

U.S. Bank National Association, as Trustee, successor in interest to Bank of America, National Association, as Trustee, successor by merger to LaSalle Bank National Association, as Trustee for Merrill Lynch First Franklin Mortgage Loan Trust 2007-1, Mortgage Pass-Through Certificates, Series 2007-1, by Nationstar Mortgage LLC, d/b/a Mr. Cooper, Servicing Agent (hereinafter MOVANT), by its undersigned counsel, files this MOTION SEEKING RELIEF FROM AUTOMATIC STAY AS TO THE PROPERTY KNOWN AS 304 DR ANDREWS WAY, UNIT A, INDIAN HEAD, MD 20640, pursuant to 11 U.S.C. SECS. 362 which is a core proceeding pursuant to 28 U.S.C. SEC. 157, and for reasons states as follows:

**ONE**

That the above-named Debtor(s) Nebra Overretta Singleton (hereinafter "DEBTOR(S)") initiated proceedings in this Court seeking relief under Chapter 7 of 11 U.S.C.

**TWO**

That the above-named Steven H. Greenfeld was appointed Interim Trustee of the Estate of the Debtor(s), is duly qualified, and is so acting.

COHN, GOLDBERG &  
DEUTSCH, LLC

ATTORNEYS AT LAW  
600 BALTIMORE AVENUE  
SUITE 208  
TOWSON, MD 21204

410-296-2550

File #: 447213

THREE

That MOVANT is the holder and/or servicer of a Note secured by a Deed of Trust, which encumbers the real property known as 304 Dr Andrews Way, Unit A, Indian Head, MD 20640 (the "property") (see attached Exhibit "A"), presently owned by the DEBTOR(S), in the approximate principal amount of \$167,144.70, plus interest, late charges and other costs. Said Instrument is recorded among the Land Records of Charles County, Maryland.

FOUR

That the DEBTOR(S) is/are in default in payment of the Deed of Trust Note to MOVANT; said default involving non-payment of EIGHTEEN (18) pre-petition payment(s) for the period of December, 2017, through May, 2019 in the amount of \$18,147.53, plus late charges, plus any additional payments and late charges thereon that may fall due after the filing of this motion, plus attorney's fees and costs.

FIVE

That MOVANT believes and avers that its security interest concerning the property is not adequately protected.

SIX

That the DEBTOR(S) has/have little or no equity in the property and the property is not necessary to an effective reorganization.

SEVEN

That MOVANT has been and continues to be irreparably injured by the Stay of S. 362(a) of the Bankruptcy Code which prevents the MOVANT from enforcing its right under its Deed of Trust.

WHEREFORE, MOVANT, prays this Honorable Court grant the following relief:

A. That the Court enter an Order lifting the Stay of S. 362 to enable U.S. Bank National Association, as Trustee, successor in interest to Bank of America, National Association, as Trustee, successor by merger to LaSalle Bank National Association, as Trustee for Merrill Lynch First Franklin Mortgage Loan Trust 2007-1, Mortgage Pass-Through Certificates, Series 2007-1, or its successors and assigns, to enforce its rights under its Deed of Trust, which would enable it to foreclose on the property.

B. That the Court grant such other and further relief as may be necessary.

/s/ Richard J. Rogers

Richard J. Rogers, Esquire  
Cohn, Goldberg & Deutsch, LLC  
600 Baltimore Avenue, Suite 208  
Towson, MD 21204  
410-296-2550  
Fax: 410-296-2558  
Email: [bankruptcyecf@cgd-law.com](mailto:bankruptcyecf@cgd-law.com)  
Federal Bar #: 01980 (MD)  
Attorney for Movant

COHN, GOLDBERG &  
DEUTSCH, LLC

ATTORNEYS AT LAW  
600 BALTIMORE AVENUE  
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\* \* \* \* \* CERTIFICATION OF SERVICE \* \* \* \* \*

ON

**MOTION SEEKING RELIEF FROM AUTOMATIC STAY AS TO THE  
PROPERTY KNOWN AS  
304 DR ANDREWS WAY, UNIT A, INDIAN HEAD, MD 20640**

I, the undersigned counsel of COHN, GOLDBERG & DEUTSCH, LLC, 600 BALTIMORE AVENUE, SUITE 208, TOWSON, MD 21204, certify that I am, and at all times hereinafter mentioned was, 18 years of age and that on June 21, 2019, I served a copy of the MOTION SEEKING RELIEF FROM AUTOMATIC STAY AS TO THE PROPERTY KNOWN AS 304 DR ANDREWS WAY, UNIT A, INDIAN HEAD, MD 20640, by FIRST CLASS MAIL, on the respondent(s) in this proceeding to:

Nebra Overretta Singleton  
304A Dr Andrews Way  
Indian Head, MD 20640

and by ELECTRONIC FILING NOTIFICATION CM/ECF to:

respondent(s)' counsel:  
Pro Se

Steven H. Greenfeld, Trustee  
2600 Tower Oaks Blvd. Ste. 103  
Rockville, MD 20852

COHN, GOLDBERG &  
DEUTSCH, LLC

ATTORNEYS AT LAW  
600 BALTIMORE AVENUE  
SUITE 208  
TOWSON, MD 21204

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I certify under penalty of perjury that the foregoing is true and correct.

Executed on June 21, 2019

/s/ Richard J. Rogers

Richard J. Rogers, Esquire  
Cohn, Goldberg & Deutsch, LLC  
600 Baltimore Avenue, Suite 208  
Towson, MD 21204  
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Fax: 410-296-2558  
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